# Safety Attribute Inspection (SAI) Data Collection Tool 3.1.8 Carriage of Cargo (OP)

# **ELEMENT SUMMARY INFORMATION**

### Purpose of this Element (certificate holder's responsibility):

To ensure that cargo handling and carrying operations are conducted safely.

# Objective (FAA oversight):

- To determine if the certificate holder's Carriage of Cargo process meets all applicable requirements of Title 14 of the Code of the Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Carriage of Cargo process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Carriage of Cargo process.

# **Specific Instructions:**

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### SUPPLEMENTAL INFORMATION

# Specific Regulatory Requirements (SRRs):

SRRs:

119.43(b)

119.43(b)(1)

119.43(b)(2)

119.43(c)

121.135(a)(1)

121.135(b)(1)

121.135(b)(2)

121.135(b)(3)

121.198

121.285(b)(5)

121.285(b)(8)

121.285(c)

121.285(c)(1)

121.285(c)(2)

121.285(c)(4)

121.285(c)(5)

121.287

121.309(c)(2)

A.522d

### Related CFRs & FAA Policy/Guidance:

- Related CFRs: Intentionally left blank
- FAA Policy/Guidance:

 FAA Policy/Guidance: Intentionally left blank

### **SAI Section 1 - Procedures Attribute**

Objective: Procedures, instructions, and information are

documented methods for accomplishing a process. The certificate holder's policies should establish their compliance posture. Policies may be stand-alone statements, or they may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural

questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Task	ks	
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the information listed in the Supplemental Information section of this DCT.	
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Carriage of Cargo process.	
3.	Review the certificate holder's Carriage of Cargo process to ensure it contains the policies, procedures, instructions and information necessary for personnel to perform their duties and responsibilities with a high degree of safety.	

Quest	tions	
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Carriage of Cargo process meet the specific regulatory and FAA policy requirements:	
1.1.	When operating any of the airplanes identified in 14 CFR part 121, section 198, does the certificate holder's Carriage of Cargo process specify that those airplanes may be operated (for cargo service only) at increased zero fuel and landing weights, subject to the requirements of sections 121.198(b)-(g)? SRRs: 121.198	☐ Yes ☐ No, Explain ☐ Not Applicable
1.2.	Does the certificate holder's Carriage of Cargo process specify that when carrying cargo in a bin in the passenger compartment:	
1.2.1	The bin may not be installed in a position that restricts access to or use of any required emergency exit, or of the aisle in the passenger compartment?  SRRs: 121.285(b)(5)	Yes No, Explain Not Applicable
1.2.2	The bin is not installed in a position that obscures any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means for proper notification of the passengers is provided?  SRRs: 121.285(b)(8)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.3.	For operations where cargo is carried aft of a bulkhead or divider in any passenger compartment, does the certificate holder's Carriage of Cargo process specify that cargo must be restrained to specified load factors? SRRs: 121.285(c)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.4.	For operations where cargo is carried aft of a bulkhead or divider in any passenger compartment, does the certificate holder's Carriage of Cargo	

	process specify that the cargo must be loaded as follows: SRRs: 121.285(c)	
1.4.1	It is properly secured by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under all normally anticipated flight and ground conditions?  SRRs: 121.285(c)(1)  Related Design JTIs:  1. Check that the Certificate Holder's manual system contains instructions and information to personnel that when cargo, is carried aft of a bulkhead or divider in any passenger compartment, ensure it is properly secured by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under all normally anticipated flight and ground conditions.  Sources: 121.135(a)(1); 121.285(c)(1)  Interfaces: 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.1(AW); 1.3.2(AW)  2. Check that the Certificate Holder's manual system contains instructions and information to personnel for cargo, carried aft of a bulkhead or divider in any passenger compartment, ensure it is restrained to the load factors in Sec. 25.561(b)(3). The Certificate Holder is responsible for providing acceptable data to ensure safety belt or tiedown devices will meet the load factors in Sec. 25.561(b)(3).  Sources: 121.135(a)(1); 121.285(c)(1)  Interfaces: 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.1(AW); 1.3.2(AW)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.4.2	It is packaged or covered in a manner to avoid possible injury to passengers and passenger compartment occupants?  SRRs: 121.285(c)(2)	Yes No, Explain Not Applicable
1.4.3	Its location does not restrict access to or use of any required emergency or regular exit, or of the aisle in the passenger compartment?  SRRs: 121.285(c)(4)	Yes No, Explain Not Applicable
1.4.4	It is positioned to not obscure any passenger's view of the seatbelt sign, no smoking sign, or required exit sign, unless an auxiliary sign or other approved means for proper notification of the passenger is provided?  SRRs: 121.285(c)(5)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.5.	Does the certificate holder's Carriage of Cargo process specify that when cargo is carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during flight, the cargo must be loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?  SRRs: 121.287	☐ Yes ☐ No, Explain ☐ Not Applicable
1.6.	If the certificate holder's aircraft has a Class E cargo compartment, does the certificate holder's Carriage of Cargo process specify that at least one hand fire extinguisher must be conveniently located for use in each such compartment and accessible to crewmembers during flight?  SRRs: 121.309(c)(2)	☐ Yes ☐ No, Explain ☐ Not Applicable
1.7.	Does the certificate holder s Carriage of Cargo process have procedures in place to allow for the proper loading and stowage of USAF-supplied medical equipment and supplies?  SRRs: A.522d	☐ Yes ☐ No, Explain ☐ Not Applicable

1.8.	Does the certificate holder s manual contain the required references to, or excerpts from, the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?  SRRs: 119.43(b)	Yes No, Explain
1.9.	If the certificate holder's manual includes excerpts from its operations specifications, are the excerpts clearly identified as part of the operations specifications?  SRRs: 119.43(b)(1)	Yes No, Explain Not Applicable
1.10.	Does the certificate holder s manual require compliance with operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?  SRRs: 119.43(b)(2)	Yes No, Explain
1.11.	Does the certificate holder s Carriage of Cargo process contain a method for keeping all persons engaged in its operations informed of the provisions of the operations specifications listed in the Supplemental Information section of this safety attribute inspection (SAI)?  SRRs: 119.43(c)	Yes No, Explain
2.	<ul> <li>Does the certificate holder's manual contain general policies for the Carriage of Cargo process that comply with the SRRs?</li> <li>SRRs: 121.135(b)(1)</li> <li>Related Design JTIs:</li> <li>1. Check that the Certificate Holder's manual has a policy that no person may operate an aircraft under this part, part 121 of this chapter, in violation of an air carrier operating certificate, operating certificate, or appropriate operations specifications issued under this part.  Sources: 119.5(l); 121.135(b)(1)  Interfaces: 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.7(AW); 1.3.14(AW); 1.3.17(AW)</li> <li>2. Check that the Certificate Holder's manual has a policy that except as provided in paragraph (b), (c), or (d) or this section, the Certificate Holder may carry cargo in the passenger compartment of an airplane.  Sources: 121.285(a)</li> </ul>	☐ Yes ☐ No, Explain
3.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)?  SRRs: 121.135(b)(3)	☐ Yes ☐ No, Explain
4.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Carriage of Cargo process?  SRRs: 121.135(b)(2)	☐ Yes ☐ No, Explain
5.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Carriage of Cargo process?  SRRs: 121.135(a)(1)	☐ Yes ☐ No, Explain

# SAI Section 1 - Procedures Attribute Drop-Down Menu

- 1. No procedures, policy, instructions or information specified.
- 2. Procedures or instructions and information do not identify (who, what, when, where, how).
- 3. Procedures, policy or instructions and information do not comply with CFR.
- 4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.
- 5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
- 6. Procedures, policy or instructions and information unclear or incomplete.
- 7. Documentation quality (e.g., unreadable or illegible).
- 8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM Flight Operations Manual to GMM General Maintenance Manual, etc.).
- 9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
- 10. Resource requirements incomplete (personnel, facilities, equipment, technical data).
- 11. Other.

# Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the system to ensure that the most important policies, procedures, or instructions and information will be followed. Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.). Tasks To meet this objective, the inspector must accomplish the following tasks: 1. Review the control questions below.

Review the certificate holder's policies, procedures, instructions, and information to gain an

understanding of the controls that it has documented.

2.

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Carriage of Cargo process:	
1.1.	If cargo is carried in the passenger compartment, is there a control or controls in place to ensure that it is positioned in a way that does not restrict access to or use of any required emergency exit (or, if not in a bin, to any regular exit), or to the aisle in the passenger compartment, except as provided in 14 CFR part 121, section 285(d)?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.2.	If cargo is carried in the passenger compartment, is there a control or controls in place to ensure that it is positioned so that it does not obscure any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means of notification is provided?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.3.	If cargo is carried aft of a bulkhead/divider in the passenger compartment, is there a control or controls in place to ensure that the cargo is restrained by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under normally anticipated flight and ground conditions?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.4.	If cargo is carried aft of a bulkhead/divider in the passenger compartment, is there a control or controls in place to ensure that the cargo is packaged or covered to avoid possible injury to passengers and passenger compartment occupants?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.5.	If the certificate holder's aircraft has a Class E cargo compartment, is there a control or controls in place to ensure that at least one hand fire extinguisher is conveniently located for use in each such compartment and accessible to crewmembers during flight?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.6.	If cargo is carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during	Yes

	flight, is there a control or controls in place to ensure that the cargo is loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?	☐ No, Explain ☐ Not Applicable
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Carriage of Cargo process?	☐ Yes ☐ No, Explain

	SAI Section 2 - Controls Attribute Drop-Down Menu	
1.	No controls specified.	
2.	Documentation for the controls do not identify (who, what, when, where, how).	
3.	Controls incomplete.	
4.	Controls could be circumvented.	
5.	Controls could be unenforceable.	
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).	
7.	Other.	

# Objective: Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasl	Tasks		
	To meet this objective, the inspector must accomplish the following tasks:		
1.	Review the process measurement questions below.		
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.		

Questions		
	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Carriage of Cargo process include the following process measurements:	
1.1.	If cargo was carried in the passenger compartment, is there a process measurement or process measurements that would identify if it was positioned in a way that restricted access to or use of any required emergency exit (or, if not in a bin, to any regular exit), or to the aisle in the passenger compartment, except as provided in 14 CFR part 121, section 285(d)?	Yes No, Explain Not Applicable
1.2.	If cargo was carried in the passenger compartment, is there a process measurement or process measurements that would identify if was it positioned so that it obscured any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means of notification was provided?	Yes No, Explain Not Applicable
1.3.	If cargo was carried aft of a bulkhead/divider in the passenger compartment, is there a process measurement or process measurements that would identify if the cargo was not restrained by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under normally anticipated flight and ground conditions?	Yes No, Explain Not Applicable
1.4.	If cargo was carried aft of a bulkhead/divider in the passenger compartment, is there a process measurement or process measurements that would identify if	Yes

	the cargo was not packaged or covered to avoid possible injury to passengers and passenger compartment occupants?	☐ No, Explain ☐ Not Applicable
1.5.	If the certificate holder's aircraft has a Class E cargo compartment, is there a process measurement or process measurements that would identify if at least one hand fire extinguisher was not conveniently located for use in each such compartment and accessible to crewmembers during flight?	☐ Yes ☐ No, Explain ☐ Not Applicable
1.6.	If cargo was carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during flight, is there a process measurement or process measurements that would identify if the cargo was not loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?	☐ Yes ☐ No, Explain ☐ Not Applicable
2.	Is there a process measurement or process measurements that would reveal if the certificate holder's policy, procedures, instructions, and information were not followed?	☐ Yes ☐ No, Explain
3.	Does the certificate holder document its process measurement methods?	☐ Yes ☐ No, Explain
4.	Does the certificate holder use its process measurement results to improve its programs?	☐ Yes ☐ No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Carriage of Cargo process?	☐ Yes ☐ No, Explain

# SAI Section 3 - Process Measurement Attribute Drop-Down Menu

- 1. No process measurements specified.
- 2. Documentation for the process measurements does not identify (who, what, when, where, how).
- 3. Inability to identify negative findings.
- 4. No provisions for implementing corrective actions.
- 5. Ineffective follow-up to determine effectiveness of corrective actions.
- 6. Resources requirements (personnel, facilities, equipment, technical data).
- 7. Other.

### **SAI Section 4 - Interfaces Attribute**

**Objective:** Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different areas within the certificate holder's system must be consistent and complement each other. For the interfaces to be effectively managed, the certificate holder's system should identify and document the interfaces.

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Que	Questions		
	To meet this objective, the inspector must answer the following questions:		
	NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.		
1.	Does the certificate holder's Carriage of Cargo process properly address the interfaces that are identified along with the individual questions in section 1, Procedures, of this DCT?	☐ Yes ☐ No, Explain	
2.	Does the certificate holder's Carriage of Cargo process document a method for assessing the impact of any changes to the associated interfaces within the Carriage of Cargo process?	☐ Yes ☐ No, Explain	

# SAI Section 4 - Interfaces Attribute Drop-Down Menu

- 1. No interfaces specified.
- 2. The following interfaces not identified within the Certificate Holder's manual system:
- 3. Interfaces listed are inaccurate.
- 4. Specific location of interfaces not identified within the manual system.
- 5. Other

# SAI Section 5 - Management Responsibility & Authority Attributes

**Objective:** The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

may of may not be the person with the responsibility.)		
Tasks		
	To meet this objective, the inspector must accomplish the following tasks:	
1.	Identify the person who has overall responsibility for the Carriage of Cargo process.	
2.	Identify the person who has overall authority for the Carriage of Cargo process.	
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.	
4.	Review the appropriate organizational chart.	
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Questions			
	To meet this objective, the inspector must answer the following questions:		
1.	Does the certificate holder clearly identify who is responsible for the quality of the Carriage of Cargo process?	Yes No, Explain Name/Title:	
2.	Does the certificate holder clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Carriage of Cargo process?	Yes No, Explain Name/Title:	
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Carriage of Cargo process?  SRRs: 121.135(b)(2)	Yes No, Explain	
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Carriage of Cargo process?  SRRs: 121.135(a)(1)	Yes No, Explain	
5.	Does the certificate holder clearly and completely document the responsibility for this position?	☐ Yes ☐ No, Explain	
6.	Does the certificate holder clearly and completely document the authority for this position?	☐ Yes ☐ No, Explain	
7.	Does the certificate holder clearly and completely document its qualification standards for the person having responsibility for the Carriage of Cargo process?	Yes No, Explain	
8.	Does the certificate holder clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Carriage of Cargo process?	☐ Yes ☐ No, Explain	
9.	Does the certificate holder clearly and completely document the procedures for delegation of authority for the Carriage of Cargo process?	Yes No. Explain	

# SAI Section 5 - Management Responsibility & Authority Attributes Drop-Down Menu

- 1. Not documented.
- 2. Documentation unclear.
- 3. Documentation incomplete.
- 4. Other.